

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JANE DOE,

Plaintiff,

v.

GENESIS HEALTHCARE and 1526  
LOMBARD STREET SNF OPERATIONS,  
LLC d/b/a POWERBACK  
REHABILITATION 1526 LOMBARD  
STREET,

Defendants.

CIVIL ACTION

No.: 2:21-cv-00551-CMR

**DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION TO PROCEED  
ANONYMOUSLY**

Defendants, Genesis Healthcare, Inc. (incorrectly identified in the Complaint; hereinafter "Genesis HealthCare") and 1526 Lombard Street SNG Operations LLC d/b/a PowerBack Rehabilitation 1526 Lombard Street ("PowerBack") (together "Defendants"), respectfully submit this response to Plaintiff's Motion to Proceed Anonymously (ECF No. 2.)

Defendants disagree with Plaintiff's factual recitation in the motion to the extent Plaintiff assumes the truth of the allegations made in the Complaint. (*See, e.g.,* Pl.'s Mem. of Law at 4 ("Due to the specific and articulable evidence and statistics which confirm that violence against transgender individuals has been on the rise, *and due to the instances of misgendering, discrimination, and harassment Plaintiff faced during her employment with the Defendants,* Plaintiff does fear violence or further retribution against her if her name and address are revealed in this lawsuit.")) (emphasis added). Defendants specifically deny that Plaintiff faced

discrimination or harassment while employed at PowerBack, through misgendering or otherwise. Defendants also deny that Plaintiff was employed by Genesis HealthCare. We expect that these factual issues will be resolved in the ordinary course after discovery.

Defendants' consent to Plaintiff's motion to proceed anonymously does not constitute an admission regarding any fact in dispute in this action and should not prejudice Defendants' ability to pursue discovery regarding the issue in dispute in this action. Subject to those caveats, Defendants do not object to Plaintiff's motion.

Respectfully submitted,

**GENOVA BURNS LLC**

Dated: April 12, 2021

/s/ James Bucci

By: James Bucci, Esq.

Lawrence Bluestone, Esq.

1600 Market Street, Suite 1650

Philadelphia, PA 19103

Tel: (215) 564-0444

Email: [jbucci@genovaburns.com](mailto:jbucci@genovaburns.com)

Email: [lbluestone@genovaburns.com](mailto:lbluestone@genovaburns.com)

*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Response to Plaintiff's Motion to Proceed Anonymously was filed through the Court's ECF system and forwarded through ECF to be served on all counsel of record.

/s/ James Bucci

Dated: April 12, 2021

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